

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RACHEL C. WILLIAMS, on behalf of
herself and others similarly situated,

Plaintiff,

v.

AMERICAN HONDA FINANCE CORP.,

Defendant.

Civil Action No. 1:14-cv-12859-LTS

**PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT
AGREEMENT**

For the reasons set forth in her accompanying Memorandum in Support of this Motion, Plaintiff Rachel Williams requests that the Court approve the Settlement Agreement reached by the Parties in this case.

1. On April 18, 2019, this Court granted preliminary approval of the Settlement and approved the issuance of notice to Settlement Class Members regarding the Settlement. ECF # 107. Notice was sent on May 31, 2019. No objections to the Settlement Agreement have been filed.

2. Ms. Williams has also requested approval of Class Counsel's attorneys' fees and expenses in the amount of \$950,000, and an incentive payment to the Class Representative in the amount of \$5,000, payable as provided in the Settlement Agreement.

3. In support of these requests, Ms. Williams asserts that the Settlement embodied by the Settlement Agreement is fair and reasonable and consistent with the

provisions of Rule 23. In further support of the motion, Ms. Williams refers the Court to the memorandum and exhibits filed herewith.

4. American Honda Finance Corporation does not oppose the relief sought by this Motion — *i.e.*, the entry of the Final Approval Order in the form attached to Plaintiff's Memorandum in Support as Exhibit 2.

WHEREFORE, Ms. Williams requests that the Court grant this motion and enter the Parties' proposed Final Approval Order.

Date: September 11, 2019

Plaintiff,
By her attorneys:

/s/ Elizabeth Ryan
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF) on September 11, 2019.

/s/ Elizabeth Ryan
Elizabeth Ryan